

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

KAIFI LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS INC.;
CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS; VERIZON SERVICES CORP.;
VERIZON ENTERPRISE SOLUTIONS, LLC;
VERIZON BUSINESS GLOBAL LLC;
VERIZON BUSINESS NETWORK
SERVICES, LLC; VERIZON CORPORATE
SERVICES GROUP INC.; VERIZON DATA
SERVICES, LLC; VERIZON MEDIA INC.;
and VERIZON ONLINE, LLC,

Defendants.

Case No. 2:20-CV-280- JRG

JURY TRIAL DEMANDED

**AGREED MOTION FOR EXTENSION TO COMPLY WITH P.R. 4-5(d) JOINT CLAIM
CONSTRUCTION CHART**

Plaintiff KAIFI LLC respectfully requests that the Court extend the deadline to comply with P.R. 4-5(d) Joint Claim Construction Chart, and would show the court the following:

The current deadline to comply with P.R. 4-5(d) is Monday, May 31, 2021. Plaintiff respectfully requests the deadline be extended from Memorial Day to the following day, June 1, 2021. Counsel for Plaintiff has conferred with counsel for Defendants, and the Defendants are agreeable to the relief requested in this motion. This extension is sought not for delay only but that justice may be done.

Accordingly, Plaintiff requests that the Court extend the deadline to comply with P.R. 4-

5(d) by one day up to and including June 1, 2021.

Respectfully submitted,

/s/ Robert Christopher Bunt

Enoch H. Liang
Cal. Bar No. 212324 (admitted in E.D. Texas)
Michael J. Song
Cal. Bar No. 243675 (admitted in E.D. Texas)

LTL ATTORNEYS LLP
300 S. Grand Ave., 14th Fl.
Los Angeles, California 90071
Telephone: (213) 612-8900
Facsimile: (213) 612-3773
Email: enoch.liang@ltmlattorneys.com
Email: michael.song@ltmlattorneys.com

Robert Christopher Bunt
Texas Bar No. 00787165
PARKER, BUNT & AINSWORTH PC
100 E. Ferguson St., Suite 418
Tyler, Texas 75702
Telephone: (903) 531-3535
Email: rcbunt@pbatyler.com

Attorneys for Plaintiff KAIFI LLC

CERTIFICATE OF SERVICE

I certify that the foregoing document was filed electronically on May 28, 2021 pursuant to Local Rule CV-5(a) and has been served on all counsel who have consented to electronic service.

/s/Robert Christopher Bunt
Robert Christopher Bunt

CERTIFICATE OF CONFERENCE

I certify that counsel for the parties have complied with the meet and confer requirement in Local Rule CV-7(h) and file this motion as agreed.

/s/Robert Christopher Bunt
Robert Christopher Bunt